

Exhibit 53

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**DECLARATION OF TAMMY PATRICK IN SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Tammy Patrick, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am Tammy Patrick. I am currently the Chief Program Officer for the National Association of Election Officials, commonly known as the Election Center. In addition, I am serving as an expert witness for Plaintiffs in the above captioned matter.

2. I am over 18 years of age and fully competent to make this Declaration. To the best of my knowledge, information, and belief, the statements made herein are true and accurate.

3. Results of the 2020 election in California were certified by the Secretary of State following post-election audits required by state law, including an audit in Los Angeles County.

4. States and counties publicly reported the technology being used during the 2020 election. That information is also publicly available at websites such as the Election Assistance Commission, Verified Voting, and the websites of states and counties. Smartmatic technology and software was not listed or identified as being used by any jurisdiction other than Los Angeles County.

5. Following the 2020 election, jurisdictions across the country conducted post-election audits. There are differing types of audits in elections:

- a. Reconciliation or Accounting Audits: These audits balance the numbers between voters who have signed in or requested a ballot and the number of ballots that were counted.
- b. Hand-Count Audits: This type of audit compares the results of a set of ballots that are manually counted against the results from the voting equipment to verify that the specific piece of equipment functioned properly.
- c. Risk Limiting Audit: Risk limiting audits validate that the correct winner was announced for any particular race by applying an algorithm to identify a random sampling of ballots to manually review.

6. Following the 2020 election, 43 states, including the states of Arizona, California, Georgia, Michigan, Nevada, North Carolina, Pennsylvania, and Wisconsin, completed post-election audits. None of the audits conducted after the 2020 election identified any vote manipulation, vote switching, or vote flipping attributable to voting


machines, including Smartmatic machines and software. Every state certified the final vote count prior to President Biden's inauguration

7. The following security measures, among others, were in place for the 2020 election:

- a. Federal and/or state certification of voting technology;
- b. Tabletop exercises of voting technology before the election;
- c. Logic and accuracy testing of voting process before the election;
- d. Deployment of Albert Sensors to detect internet-based intrusion;
- e. Use of paper ballots to record votes;
- f. Allowance of bi-partisan observation of the voting and election process;
- and
- g. Post-election audits of voting. .

8. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 11/11/2024

A handwritten signature in black ink, appearing to read "Tammy Patrick", written over a horizontal line.

Tammy Patrick